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The Honorable David Vitter
Ranking Member
U.S. Senate Committee on Environment and Public Works
Minority Office
456 Dirksen Senate Office Building
Washington, DC 20510-6175

Subject: G. McCarthy Testimony to the Senate Environment and Public Works Committee (April 8, 2013)

Dear Senator Vitter:

It recently came to our attention that inaccurate statements were made regarding a significant research program conducted by the Coordinating Research Council (CRC). These statements were made by Ms. Gina McCarthy in her response to questions you submitted as part of her Senate Environment and Public Works Committee confirmation hearing for EPA Administrator (April 8, 2013). Your questions, which follow, were related to EPA's 2010 and 2011 waiver approvals of E15 in 2001 and newer vehicles:

Question: Was EPA aware of ongoing CRC testing on engine durability, fuel pumps and other engine components? Why not wait until that test was complete before making a decision? Because in the aftermath it looks like the decision was, at best, premature. The CRC data shows millions of approved vehicles are in danger of engine damage.

Response: EPA has reviewed the limited portions of the CRC test program made available to the public. Unfortunately, complete information on the testing program has not been made available to the government, and the CRC expressly denied EPA or the Department of Energy (DOE) a role in the test program. As DOE has highlighted repeatedly (see for example here: <http://energy.gov/articles/getting-it-right-accurate-testing-and-assessments-critical-deploying-next-generation-auto>), the CRC E15 test programs have a number of significant scientific shortcomings, including failure to test components or vehicles on E0 and E10 to provide information on typical failure rates for baseline fuels.

Let me preface my comments here with a short background statement about CRC and its operations. CRC conducts each of its research projects with the support and oversight of a technical committee comprised of experts from industry who are most knowledgeable on the topic of study. Focus on project objectives is achieved through assignment of project leaders and a project panel team of experts drawn from industry and other stakeholders who have extensive experience in the design and conduct of research in the area of interest. CRC was incorporated in 1942 to support the U.S.

and allied war effort and it has since continued to provide critical data that has been the basis for vehicle/fuel performance criteria used to establish commercial and military fuel standards over its more than 70 year history of operation. CRC has been referred to as a “national treasure” and as the “gold standard” for research on vehicle and fuel interactions.

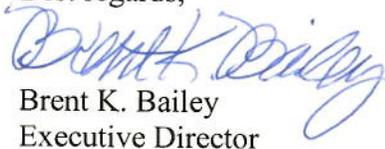
Apparently, Ms McCarthy was misinformed regarding the many pro-active steps taken by CRC to coordinate its research program on mid-level ethanol blends with both EPA and DOE and many other stakeholders. I can assure you that complete information on the testing programs conducted by CRC and the corresponding results were communicated to both EPA and DOE in a timely manner. As a matter of standing policy, all CRC research is made publicly available on the CRC website at www.crcao.org. For the mid-level ethanol blend research program on E15 and E20 additional pro-active steps were taken to specifically inform both EPA and DOE regarding research underway. In addition, special notifications were sent to DOE and EPA when reports were about to be published on the CRC website.

The scope and objectives of new CRC research projects are described each year in the CRC Annual Report posted on our website. Therefore the government and the public may monitor CRC’s research program content. Again, in the case of the mid-level ethanol blend research program, numerous coordination meetings were held with DOE, EPA and other stakeholders to review plans and discuss results. In particular, CRC included DOE representatives as members of the technical panels that monitored vehicle performance research and CRC also included EPA representatives as members of technical panels that oversee vehicle emissions research. It is patently inaccurate to suggest that CRC has expressly denied EPA or DOE a role in our research test program.

Regarding the internet reference on the CRC test program, the writer of this reference was also significantly misinformed on the issues. CRC researchers are experimental design experts who understand the need for baseline experiments as a reference points for assessing significance of results. Performance failure rates of baseline fuels are reported in each of the mid-level ethanol blend research reports published by CRC.

I would be pleased to provide additional details or answer on any questions you may have on CRC and its operations. It is unfortunate that misinformation gets propagated as it was in the case of this testimony. My purpose is to correct the inaccurate portrayal of the testimony you received.

Best regards,



Brent K. Bailey
Executive Director